

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

MESFIN WOLDETADIK,

Plaintiff,

vs.

7-ELEVEN, INC.,

Defendant.

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CIVIL ACTION NO: 3:11-cv-02999-L

DEMAND FOR JURY TRIAL

PLAINTIFF'S RULE 26 DISCLOSURES

To: Defendant, 7-ELEVEN, INC., through its attorney of record M. Wilson Stoker, Esq., Welter Law Firm, P.C., 101 W. Sixth Street, Suite #821, Austin, Texas 78701, Tel: (703) 435-8500, Fax: (703) 435-8851.

As required by Fed. R. Civ. P. 26(a)(1), Plaintiff Mesfin Woldetadik, hereby submits his following initial disclosures:

A. Individuals with Discoverable Information

1. The names, addresses and telephone numbers of individuals likely to have discoverable information that Plaintiff may use to support his claims or defenses are listed below along with the subject matter of the information known to these individuals.

1) Mesfin Woldetadik

Contact: Hiram McBeth, Esq., 6060 N. Central Expressway, Suite #560,
Dallas, Texas 75206; Tel: (972) 498-8702; Fax: (972) 674-3111

Subject Matter of Testimony: Outline the standard operating procedure of defendant concerning the day-to-day operations, the events which occurred on May 19, 2011; occurred at 7-Eleven Store #18717 located at: 2223 South Beckley Avenue, Dallas, Texas 75224, unequal application and enforcement of 7-Eleven Policies among all 7-Eleven employees, 7-Eleven's security policies & procedures, 7-Eleven's employee right to protect self-policy, history of security issues at #18717, the 7-Eleven merit system, 7-Eleven following its own policy, 7-Eleven discipline of employees, abusive language, condescending comments, disparaging comments, discrimination, favoritism, harassment, hostile working conditions, retaliation and termination of plaintiff.

2) Dianne Washington, Human Resource Generalist

Contact: M. Wilson Stoker, Esq., 101 W. Sixth Street, Suite #801,
Austin, Texas 78701; Tel: (703) 435-8500; Fax: (703) 435-8851

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3) Van Nadarajaha

Contact: M. Wilson Stoker, Esq., 101 W. Sixth Street, Suite #801,
Austin, Texas 78701; Tel: (703) 435-8500; Fax: (703) 435-8851

Subject Matter of Testimony: Outline the standard operating procedure of defendant concerning the day-to-day operations, the events which occurred on May 19, 2011; occurred at 7-Eleven Store #18717 located at: 2223 South Beckley Avenue, Dallas, Texas 75224. unequal application and enforcement of 7-Eleven Policies among all 7-Eleven employees, 7-Eleven's security policies & procedures, 7-Eleven's employee right to protect self-policy, history of security issues at #18717, the 7-Eleven merit system, 7-Eleven following its own policy, 7-Eleven discipline of employees, abusive language, condescending comments, disparaging comments, discrimination, favoritism, harassment, hostile working conditions, retaliation and termination of plaintiff.

4) Solomon Basazenew

Contact: M. Wilson Stoker, Esq., 101 W. Sixth Street, Suite #801,
Austin, Texas 78701; Tel: (703) 435-8500; Fax: (703) 435-8851

Subject Matter of Testimony: Outline the standard operating procedure of defendant concerning the day-to-day operations, the events which occurred on May 19, 2011; occurred at 7-Eleven Store #18717 located at: 2223 South Beckley Avenue, Dallas, Texas 75224, unequal application and enforcement of 7-Eleven Policies among all 7-Eleven employees, 7-Eleven's security policies & procedures, 7-Eleven's employee right to protect self-policy, history of security issues at #18717, the 7-Eleven merit system, 7-Eleven following its own policy, 7-Eleven discipline of employees, abusive language, condescending comments, disparaging comments, discrimination, favoritism, harassment, hostile working conditions, retaliation and termination of plaintiff.

5) Attabachew

Contact: M. Wilson Stoker, Esq., 101 W. Sixth Street, Suite #801,
Austin, Texas 78701; Tel: (703) 435-8500; Fax: (703) 435-8851

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system, 7-Eleven following its own policy, 7-Eleven discipline of employees, abusive language, condescending comments, disparaging comments, discrimination, favoritism, harassment, hostile working conditions, retaliation and termination of plaintiff.

6) Loss Prevention Person

Contact: M. Wilson Stoker, Esq., 101 W. Sixth Street, Suite #801,
Austin, Texas 78701; Tel: (703) 435-8500; Fax: (703) 435-8851

Subject Matter of Testimony: Outline the standard operating procedure of defendant concerning the day-to-day operations, the events which occurred on May 19, 2011; occurred at 7-Eleven Store #18717 located at: 2223 South Beckley Avenue, Dallas, Texas 75224, unequal application and enforcement of 7-Eleven Policies among all 7-Eleven employees, 7-Eleven's security policies & procedures, 7-Eleven's employee right to protect self-policy, history of security issues at #18717, the 7-Eleven merit system, 7-Eleven following its own policy, 7-Eleven discipline of employees, abusive language, condescending comments, disparaging comments, discrimination, favoritism, harassment, hostile working conditions, retaliation and termination of plaintiff.

7) Customer

Contact: M. Wilson Stoker, Esq., 101 W. Sixth Street, Suite #801,
Austin, Texas 78701; Tel: (703) 435-8500; Fax: (703) 435-8851

Subject Matter of Testimony: Outline the standard operating procedure of defendant concerning the day-to-day operations, the events which occurred on May 19, 2011; occurred at 7-Eleven Store #18717 located at: 2223 South Beckley Avenue, Dallas, Texas 75224, unequal application and enforcement of 7-Eleven Policies among all 7-Eleven employees, 7-Eleven's security policies & procedures, 7-Eleven's employee right to protect self-policy, history of security issues at #18717, the 7-Eleven merit system, 7-Eleven following its own policy, 7-Eleven discipline of employees, abusive language, condescending comments, disparaging comments, discrimination, favoritism, harassment, hostile working conditions, retaliation and termination of plaintiff.

8) Co-worker Named Peter who Initially Replaced Plaintiff

Contact: M. Wilson Stoker, Esq., 101 W. Sixth Street, Suite #801,
Austin, Texas 78701; Tel: (703) 435-8500; Fax: (703) 435-8851

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Plaintiff reserves the right to supplement this information as additional information becomes available to Plaintiff.

B. Relevant Documents, Electronically Stored Information & Tangible Things

2. The following is a list of all documents, electronically stored information, and tangible things, described by category and location, that plaintiff has in his possession, custody, or control and may use to support his claims or defenses:

Category - Documents

Location - Possession of Plaintiff

Copies of e-mails, correspondence, memorandums, copied photo images and reports.

Plaintiff reserves the right to supplement this information if any additional items are located.

C. Information Related to Calculation of Damages

3. Attached is a computation of Plaintiff's damages. All nonprivileged documents that this computation is based on are attached.

*Plaintiff is in the process of having an expert witness economist perform the lost wage calculation. Once the expert witness economist calculation is completed, Plaintiff will supplement this response and provide that information to the Defendant.

Plus \$1,000,000.00 in mental anguish, plus \$15,000,000.00 in punitive, plus attorney fees and costs which are yet to be determined.

Plaintiff reserves the right to supplement this information as additional information becomes available to Plaintiff.

D. Insurance

4. All insurance agreements required to be disclosed are described below:

To plaintiff's knowledge he does not have insurance agreements that would apply to the underlying lawsuit.

Dated this 24th day of May, 2012.

/s/ Hiram McBeth

Hiram McBeth, Esq.

SBT No. #13329500

6060 North Central Expwy, Suite #560

Dallas, Texas 75206

Tel: (972) 498-8702

Fax: (972) 674-3111

ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on May 24, 2012, I electronically filed the foregoing document with the Clerk of the Court for the U.S. District Court, for the Northern District of Texas using the electronic case filing system of the Court. The electronic filing system sent a "Notice of Electronic Filing" to the following attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means:

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ATTORNEYS FOR 7-ELEVEN, INC.

/s/ Hiram McBeth
Hiram McBeth, Esq.